### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

)
)
Case No. 4:19-CV-00412-P
)
) ) DEMAND FOR JURY TRIAL )

# JOINT NOTICE OF SETTLEMENT IN PRINCIPLE AND MOTION TO STAY PROCEEDINGS FOR THIRTY DAYS

Relator and JPS respectfully submit this Notice of Settlement in Principle and Motion to Stay to advise the Court that the Parties have reached a settlement in principle. Following mediation on June 23, 2021, the Parties have agreed to principle terms to settle this action, which remain subject to final approval by the United States and JPS's Board. The Parties anticipate that final approval will take approximately thirty (30) days. Therefore, the Parties respectfully request that the Court stay all proceedings and deadlines in this action for thirty days to allow the Parties time to obtain final approvals, finalize settlement papers, and execute the same. In the event final settlement is reached, the Parties will notify the Court so this matter can be closed.

June 25, 2021

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

The undersigned attorney certifies that the foregoing was served on counsel in this matter on June 25, 2021, via the Court's electronic filing system.

/s/ Joshua M. Russ Joshua M. Russ